

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

**TITAN TIRE CORPORATION OF
FREEPORT,**

Plaintiff/Counter-Defendant,

V.

**UNITED STEELWORKERS OF AMERICA,
LOCAL 745L,**

Defendant/Counter-Plaintiff.

Case No. 3:08 C 50014

Magistrate P. Michael Mahoney
Presiding Judge

MOTION FOR EXTENSION OF TIME

Defendant/Counter-Plaintiff Local 745L hereby moves for a seven-day extension of time to file its Motion for Summary Judgment. These are the reasons for the motion:

1. Pursuant to a telephone status call on March 20, 2008, the parties agreed to file motions for summary judgment on April 21, 2008, and to present them to the Court on April 30, 2008. Counsel noted the April 30 date in his calendar but neglected to enter the April 21 date. Due to a clerical error, counsel never received the written order issued by the Court. Accordingly, counsel was surprised and dismayed when he received Plaintiff/Counter-Defendant's summary judgment papers on April 21, 2008.

2. Counsel is scheduled to be out of the office from April 22 to April 25, 2008. The earliest counsel can complete and file the summary judgment papers is April 28, 2008. Thus,

counsel requests a seven-day extension of time, to April 28, 2008, to file the summary judgment papers in this case.

3. Counsel has contacted opposing counsel, and opposing counsel does not object to this motion.

4. Counsel apologizes to the Court. Allowing the filing of the Defendant's summary judgment papers on April 28 will still allow meaningful preparation for the status conference on April 30, 2008, and will not prejudice the rights of the parties in this case.

WHEREFORE, Defendant/Counter-Plaintiff USW Local 745 hereby prays that the Court allow it an extra seven days, to April 28, 2008, to file its Motion for Summary Judgment in this case.

Respectfully submitted,

CORNFIELD AND FELDMAN

By: /s/ Stephen A. Yokich
Stephen A. Yokich
Attorney Bar Number 6181707

Attorneys for Defendant United Steel Workers,
Local 745L

Dated: April 22, 2008

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CERTIFICATE OF SERVICE

Stephen A. Yokich, an attorney, hereby certifies that on April 22, 2008, he caused the foregoing **Request for Extension of Time** to be filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Michael R. Lied, Esq.
Tracy C. Litzinger, Esq.
HOWARD & HOWARD
One Technology Plaza, Suite 600
211 Fulton Street
Peoria, IL 61602-1350

and further certifies that on April 22, 2008, he caused the same document to be served upon the following nonregistered participants by U.S. Mail, first-class postage prepaid and addressed as shown below:

Gene R. La Suer, Esq.
DAVIS, BROWN, KOEHN, SHORS & ROBERTS, P.C.
666 Walnut Street, Suite 2500
Des Moines, Iowa 50309-3993

/s/ Stephen A. Yokich
Stephen A. Yokich